

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Rio Tinto plc,

Plaintiff,

-against-

Vale S.A., Benjamin Steinmetz, BSG  
Resources Limited, VBG–Vale BSGR Limited  
aka BSG Resources (Guinea) Ltd. aka  
BSG Resources Guinée Ltd, BSG Resources  
Guinée SARL aka BSG Resources (Guinea)  
SARL aka VBG-Vale BSGR, Frederic Cilins,  
Mamadie Touré, and Mahmoud Thiam,

Defendants.

14 Civ. 3042 (RMB) (AJP)

**NOTICE OF APPLICATION FOR THE ISSUANCE OF INTERNATIONAL  
LETTER OF REQUEST (LETTER ROGATORY)**

PLEASE TAKE NOTICE that upon the Application for the Issuance of an International Letter of Request submitted by Defendant Vale S.A. (“Vale”), and exhibits thereto, and all other papers and proceedings herein, Vale will move this Court before the Honorable Richard M. Berman, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court, for an order issuing a Letter of Request addressed to the Senior Master of the High Court (Queen’s Bench Division) acting as the Competent Judicial Authority of the United Kingdom.

Dated: New York, New York  
February 23, 2015

Respectfully submitted,

CLEARY GOTTLIEB STEEN & HAMILTON LLP

By: /s/ J. Blackman  
Jonathan I. Blackman  
Lewis J. Liman  
Boaz S. Morag

One Liberty Plaza  
New York, New York 10006  
(212) 225-2000  
(212) 225-3999

*Attorneys for Defendant Vale S.A.*